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Attorneys for Defendant Aramark Correctional Services, LLC

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ARMIDA RUELAS; DE'ANDRE EUGENE
COX; BERT DAVIS; KATRISH JONES;
JOSEPH MEBRAHTU; DAHRYL
REYNOLDS; MONICA MASON; LUIS
NUNEZ-ROMERO; and all others similarly
situated,

Plaintiffs,

v.

COUNTY OF ALAMEDA; GREGORY J.
AHERN, SHERIFF; ARAMARK
CORRECTIONAL SERVICES, LLC; and
DOES 1 through 10,

Defendants.

Civil Case No.: 4:19-CV-07637 JST

**DECLARATION OF
CORTLIN H. LANNIN IN SUPPORT OF
JOINT STIPULATION TO CONTINUE
APRIL 28, 2020 INITIAL CASE
MANAGEMENT CONFERENCE TO
JULY 21, 2020**

1 I, CORTLIN H. LANNIN, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to practice
3 before this Court. I am a partner in the law firm of Covington & Burling LLP, counsel for Aramark
4 Correctional Services, LLC (“Aramark”). If called upon to testify as to the facts set forth herein, I could
5 and would testify competently thereto.

6 2. On November 22, 2019, the Court issued an order setting an initial CMC for February 25,
7 2020, along with related deadlines (*see* Dkt. No. 5).

8 3. On December 11, 2019, plaintiffs and Aramark filed a joint stipulation to extend
9 Aramark’s deadline to answer or otherwise respond to the Complaint to January 17, 2020 (*see* Dkt.
10 No. 11).

11 4. On February 5, 2020, the parties filed a joint stipulation to continue the initial CMC from
12 February 25, 2020 to April 28, 2020 (*see* Dkt. No. 30).

13 5. On February 6, 2020 the Court granted the parties’ stipulated request to continue the
14 initial CMC from February 25, 2020 to April 28, 2020 (*see* Dkt. No. 34).

15 6. Defendants County of Alameda, Sheriff Gregory J. Ahern, and Aramark filed motions to
16 dismiss the Complaint (*see* Dkt. Nos. 13, 23), which the Court has taken under submission (*see* Dkt.
17 Nos. 36, 37).

18 7. The Court’s decisions on defendants’ motions to dismiss may affect the scope of
19 plaintiffs’ case and discovery.

20 8. The Court has indicated that it will grant stipulated requests to continue case management
21 conferences scheduled before May 1, provided that the requested continuance is for not more than 90
22 days. *See* <https://apps.cand.uscourts.gov/CEO/cfd.aspx?7146#Notes>.

23 9. Continuing the initial CMC to permit the Court time to consider defendants’ motions will
24 promote efficiency and conserve judicial resources.

25 10. Continuing the initial CMC also will provide necessary time for the parties and their
26 counsel to coordinate and prepare appropriately for the CMC and the antecedent activities tethered to the
27 CMC, which activities are not currently practicable under existing conditions associated with the
28 COVID-19 pandemic.

1 11. The parties therefore propose to continue the initial CMC on April 28, 2020 to July 21,
2 2020, and to continue related deadlines that are tethered to the date of that CMC.

3 12. The requested modification will move the scheduled initial CMC date forward by less
4 than 90 days.

5 I declare under the penalty of perjury under the laws of the United States that the foregoing is
6 true and correct. This declaration is executed this 31st day of March, 2020, in San Francisco, California.

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8 /s/ Cortlin H. Lannin
9 Cortlin H. Lannin
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